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April 23, 2012

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Connect America Fund
WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92,
96-45; GN Docket No. 09-51; WT Docket No. 10-208

Dear Ms. Dortch:

T-Mobile USA, Inc. (“T-Mobile”) responds to the March 27, 2012 ex parte letter (“Opposition Letter”),¹ submitted by Cellular South, Inc. d/b/a C Spire Wireless and four other wireless carriers (“C Spire Group”), opposing T-Mobile’s Petition for Reconsideration or Clarification (“T-Mobile PFR”)² of a rule promulgated by the Transformation Order.³ The Opposition Letter repeats the arguments previously raised in an opposition filed by some of the same carriers (“Joint Parties Opposition”),⁴ without even attempting to rebut T-Mobile’s reply in support of its PFR (“T-Mobile Reply”),⁵ or, in some cases, raises new, equally flawed arguments.

The Opposition Letter fails to refute the central proposition of the T-Mobile PFR, namely, that the Rule 54.307(e)(1) methodology for calculating the “monthly baseline support

¹ Letter from Robert S. Koppel, Counsel to Cellular South, Inc. d/b/a C Spire Wireless, United States Cellular Corp., Smith Bagley, Inc., Allied Wireless Communications Corp. and Georgia RSA #8 Partnership, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90 *et al.* (Mar. 27, 2012).

² T-Mobile USA, Inc. Petition for Reconsideration or Clarification, *Connect America Fund*, WC Docket Nos. 10-90 *et al.* (Dec. 29, 2011).

³ *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (“Transformation Order”), 76 Fed. Reg. 73830 (Nov. 29, 2011).

⁴ Opposition to T-Mobile Petition for Reconsideration or Clarification filed by C Spire Wireless, United States Cellular Corp. and Smith Bagley, Inc., *Connect America Fund*, WC Docket Nos. 10-90 *et al.* (Feb. 9, 2012). The C Spire Group consists of the three carriers that filed the Joint Parties Opposition, plus Allied Wireless Communications Corp. (“Allied”) and Georgia RSA #8 Partnership. The three carriers filing the Joint Parties Opposition will be referred to as the Joint Parties.

⁵ T-Mobile USA, Inc. Reply to Oppositions to Petition for Reconsideration or Clarification, *Connect America Fund*, WC Docket Nos. 10-90 *et al.* (Feb. 21, 2012).

amount”⁶ of a competitive eligible telecommunications carrier (“CETC”), for purposes of the phase-down of high-cost support, is inconsistent with the phase-down baseline policy decision in the Transformation Order.⁷ The rule therefore should be revised to carry out the intent of the Transformation Order.⁸

By this filing, T-Mobile withdraws its PFR as to the three states in which it has pending ETC designation applications – Arizona, Mississippi and Oregon.⁹ Accordingly, the Commission should grant the T-Mobile PFR promptly and reconsider or clarify the monthly baseline calculation rule for purposes of determining support amounts as to the five states for which T-Mobile has been designated an ETC and received high-cost support for a portion of 2011, namely, Hawaii, Idaho, Minnesota, Louisiana and Georgia.¹⁰

The Opposition Letter Fails To Rebut The Discrepancy Between The Transformation Order And The Rule: The T-Mobile PFR and Reply demonstrated that the calculation of the monthly baseline support amount in Rule 54.307(e)(1) is fundamentally inconsistent with the Transformation Order. The C Spire Group asserts that the challenged rule is consistent with the Transformation Order because it specifies that ““a full calendar year of support”” will be used ““to set the baseline,””¹¹ and characterizes T-Mobile’s request as seeking

⁶ 47 C.F.R. § 54.307(e)(1).

⁷ T-Mobile PFR at 4-8.

⁸ The Opposition Letter repeats the argument that T-Mobile cannot blame regulatory delays or obstruction by other parties for what the Opposition Letter, at 3, characterizes as “T-Mobile’s own failure to prosecute its pending ETC applications.” T-Mobile demonstrated, however, that both factors accounted for the timing of some of its designations. See T-Mobile Reply at 5-7. In fact, Allied, one of the carriers in the C Spire Group, was rebuked by the Idaho Public Utilities Commission (“IPUC”) for its “untimely, inappropriate” and dilatory “Motion to Defer Deliberation” filed in T-Mobile’s ETC designation proceeding at the IPUC. See T-Mobile Reply at 6 (quoting *Application of T-Mobile West Corp. for Designation as an Eligible Telecommunications Carrier*, Order No. 32319 at 10, Case No. TMW-T-10-01 (Idaho Pub. Util. Comm’n Aug. 9, 2011)). Like T-Mobile, Allied also was designated an ETC in Idaho in 2011 (see *Application of Allied Wireless Communications Corp. dba Alltel Wireless for Designation as an Eligible Telecommunications Carrier*, Order No. 32209, Case No. ALL-T-10-01 (Idaho Pub. Util. Comm’n Mar. 22, 2011)), and, although Allied’s support was reduced in that state as a result of T-Mobile’s ETC designation, Allied would benefit from the grant of the T-Mobile PFR, relative to the support it would receive in that state if the T-Mobile PFR is denied.

⁹ Those ETC applications, as well as T-Mobile’s ETC application in Georgia, were discussed in the T-Mobile PFR at 8-10. The Georgia ETC application subsequently was granted effective as of November 17, 2011. See T-Mobile Reply at 3. It also should be noted that T-Mobile has converted its Mississippi and Oregon ETC designation applications to Lifeline-only ETC applications. See Amended Application for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Lifeline-Only Support, *T-Mobile West Corp.’s Petition for Designation as an Eligible Telecommunications Carrier*, Docket UM 1511 (Pub. Util. Comm’n of Ore. Apr. 20, 2012); Second Amended Petition of T-Mobile South LLC and Powertel/Memphis, Inc. for Limited Designation as Eligible Telecommunications Carriers for the Purpose of Receiving Lifeline Support Only, *Petition of T-Mobile South LLC for Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Federal Universal Service Support*, Docket No. 2010-UA-431 (Miss. Pub. Serv. Comm’n Apr. 10, 2012).

¹⁰ The rationale for the requested relief for CETCs receiving support for part of 2011 is set forth in the T-Mobile PFR at 4-8, 10-13.

¹¹ Opposition Letter at 2 (quoting Transformation Order, 26 FCC Rcd at 17831, ¶ 515).

to have the monthly baseline amount calculated based on “annualized 2011 support, not total 2011 support.”¹²

All parties agree that the baseline is based on “total 2011 support” under the Transformation Order; the issue is how the “monthly baseline support amount”¹³ should be derived from the total 2011 support to fulfill the Transformation Order’s intent. The C Spire Group’s argument thus begs the question. They simply ignore the language in the Transformation Order supporting T-Mobile’s position that dividing the total 2011 support by 12 cannot yield a monthly baseline support amount that “will provide a reasonable approximation of the amount that [CETCs] would currently expect to receive, absent reform,”¹⁴ and thereby phase down legacy support “gradual[ly]” from the level of existing support “as of year end 2011.”¹⁵ The C Spire Group has not demonstrated how division of a carrier’s 2011 support by 12, in cases where the carrier received support for fewer than 12 months in 2011, is consistent with the language and intent of the Transformation Order or equitable, relative to the treatment of other CETCs.

The C Spire Group Is Wrong In Asserting That Grant Of The T-Mobile PFR Would Contravene The Commission’s Policy Of Reducing Legacy USF Support: The Joint Parties Opposition argued that the relief T-Mobile seeks would deprive what the Joint Parties view as more deserving CETCs of needed support. Now, apparently in response to the T-Mobile Reply, they argue in the Opposition Letter that the T-Mobile PFR would increase the total high-cost fund in “uncapped” states.¹⁶ This new argument is equally flawed.

First, there are no “uncapped” states. The cap on CETC support imposed by the Interim Cap Order applies in all states,¹⁷ and grant of the T-Mobile PFR would not change that. What the C Spire Group incorrectly characterizes as uncapped states are those states that have experienced a *reduction* in total CETC support due to relinquishments of ETC status – such as Centennial’s relinquishment petition in Louisiana – and other factors, leaving them below the state-wide cap.¹⁸ In all cases, support will not exceed the statewide cap.

Further, the C Spire Group claim that grant of the T-Mobile PFR would increase total CETC support in a given state above the total amount of support that would be distributed if the PFR is denied proves nothing. To start, that assertion pertains to only two states – Hawaii and

¹² Opposition Letter at 1.

¹³ 47 C.F.R. § 54.307(e)(1) (emphasis added).

¹⁴ Transformation Order, 26 FCC Rcd at 17831, ¶ 515.

¹⁵ *Id.* at 17675, ¶ 29.

¹⁶ Opposition Letter at 2.

¹⁷ See *High-Cost Universal Service Support*, 23 FCC Rcd 8834 (2008) (“Interim Cap Order”), *aff’d sub nom. Rural Cellular Ass’n v. FCC*, 588 F.3d 1095 (D.C. Cir. 2009).

¹⁸ See, e.g., *Centennial Lafayette Communications, LLC*, Ex Parte, Order No. S-31725, Docket No. S-31725, 2010 La. PUC LEXIS 284 (La. Pub. Serv. Comm’n, Dec. 22, 2010) (“Centennial Relinquishment Order”).

Louisiana – and it is factually incorrect as to Hawaii.¹⁹ There, the total CETC support paid in November 2011, when the Transformation Order was released, was reduced as a result of the interim cap.²⁰ Because CETC support is limited by the interim cap in Hawaii, grant of the T-Mobile PFR will not result in an increase in total CETC support in that state. In the case of Louisiana, the total CETC support in that state was brought below the cap by Centennial's relinquishment of its ETC designation at the end of 2010.²¹ Accordingly, the Louisiana Public Service Commission was on notice that support in that state was below the cap and granted T-Mobile's ETC designation application several months later with that knowledge.²² Finally, the C Spire Group argument that it is against public policy to clarify the CETC phase-down support rules in a way that nominally increases the overall fund also is inconsistent with the application for review filed by one of the C Spire Group carriers, United States Cellular Corp. ("US Cellular"), that US Cellular admits will increase overall "frozen" monthly high-cost support by \$2.88 million.²³ By comparison, grant of the T-Mobile PFR will increase total frozen monthly CETC support in Louisiana by approximately \$150,000 during the initial baseline period, resulting in total CETC support still well under the cap by at least one million dollars per month during that period.²⁴

¹⁹ As stated above, T-Mobile is withdrawing its PFR as to the other two states referenced in the C Spire Group's "uncapped" states discussion – Arizona and Oregon. See Opposition Letter at 2.

²⁰ See attached print-out of November 2011 USAC detailed payment data for Hawaii in Appendix A. The figures in parentheses in the column headed "Current Period Cap" show the reduction in support in each study area caused by the interim cap. USAC payment data is available through the "Detailed Payment Data Search" engine at <http://www.usac.org/hc/tools/detail-disbursement-data/default.aspx> (click on "Advanced Search" and fill in the year, month and state in response to the query).

²¹ Compare CETC support data in the attached print-out of September 2011 USAC disbursement data for Louisiana in Appendix B with Letter from Sharon Gillet, Chief, Wireline Competition Bureau, FCC, to Karen Majcher, Vice President, High-Cost and Low Income Division, Universal Service Administrative Co., DA 11-243, WC Docket No. 05-337 (Feb. 8, 2012), Attachment A, "Interim Cap Adjustments by State ("Adjusted Cap Table"). USAC disbursement data is available through the "Funding Disbursement Search Results" engine at <http://www.usac.org/hc/tools/disbursements/default.aspx> (fill in the year, month and state in response to the query). The total CETC support disbursed in Louisiana in September 2011 can be calculated by adding up all of the amounts in the component columns for each CETC study area in the print-out in Appendix B. That support totals roughly \$3.9 million, compared to an adjusted monthly cap for Louisiana of just under \$5.4 million in the Adjusted Cap Table. Centennial's relinquishment request was granted at the end of 2010. See Centennial Relinquishment Order.

²² The Louisiana disbursement data in Appendix B is for September 2011, the month prior to the grant of T-Mobile's ETC designation application in Louisiana. See *T-Mobile Central, LLC Ex Parte Application for Designation as an Eligible Telecommunications Carrier (ETC) for the purposes of receiving Universal Service Support for low income and rural service*, Docket No. S-31865 (La. Pub. Serv. Comm'n decided Oct. 12, 2011, adopted Dec. 8, 2011). As noted in the T-Mobile Reply, this Commission stated in the Transformation Order, 26 FCC Rcd at 17675-76, ¶ 31, that "[w]e do not disturb the existing role of states in designating ETCs," and thus should not undermine state ETC designations by reducing support more abruptly than the phase-down established in the Transformation Order. T-Mobile Reply at 9-10.

²³ See Application for Review filed by Eagle Telephone Systems, d/b/a Snake River and US Cellular at 6, *A National Broadband Plan for Our Future*, GN Docket No. 09-51 (Mar. 5, 2012).

²⁴ See monthly CETC support and cap data in note 21, *supra*.

T-Mobile's ETC Support Will Assist New Build-Out In High-Cost Areas: T-Mobile satisfied all public interest conditions in each of its ETC designation proceedings,²⁵ and the new C Spire Group suggestion that T-Mobile seeks support “for prior investment, made perhaps many years ago . . . without a penny of high-cost support”²⁶ is simply wrong. As T-Mobile certified, and five state commissions have found, T-Mobile will use its support for new build-out investment in high-cost areas.²⁷

The C Spire Group Letter Misstates The Transformation Order: The C Spire Group incorrectly asserts that the Transformation Order found that T-Mobile did not need any high-cost support.²⁸ In fact, that order stated that AT&T and T-Mobile will maintain “at least their existing coverage footprints even if the support they receive today is phased out.”²⁹ In other words, T-Mobile will be able to accommodate the “gradual” phase-out of CETC support from the level of existing support “as of year end 2011.”³⁰ T-Mobile is not challenging the five-year phase-out of CETC support, however, and expects to maintain its existing coverage if support is phased out in the manner established in the Transformation Order. Rather, the certifications that T-Mobile made in connection with its granted ETC designation applications committed it to *expanded* coverage. Those build-out commitments are at risk if its support is phased out more precipitously than intended by the Transformation Order.³¹

T-Mobile Will Not Require A Waiver Of The Commission's ETC Certification Rules: Finally, the C Spire Group mistakenly asserts that T-Mobile requires a waiver in order to have its Georgia ETC designation order deemed retroactively effective prior to December 31, 2011.³² Unlike the situation presented in the *Allied* waiver proceeding cited in the Opposition Letter, T-Mobile has already made the required self-certification filings within 60 days of the effective date of its Georgia ETC designation (November 17, 2011), and thus will not need a waiver to begin receiving support as of November 2011.³³

²⁵ See T-Mobile Reply at 8-13; T-Mobile PFR at 10-12.

²⁶ Opposition Letter at 2.

²⁷ See T-Mobile Reply at 12-13; T-Mobile PFR at 10-12.

²⁸ Opposition Letter at 3.

²⁹ Transformation Order, 26 FCC Rcd at 17824, ¶ 495.

³⁰ *Id.* at 17675, ¶ 29.

³¹ T-Mobile Reply at 10-11; T-Mobile PFR at 10-13.

³² See Opposition Letter at 3 & n.4.

³³ See *Allied Wireless Communications Corp. Petition for Waiver of Sections 54.307(d), 54.313, and 54.314 of the Commission's Rules*, 26 FCC Rcd 5233 (WCB 2011) (denying waiver that would have allowed Allied to receive support as of the retroactive effective date of its ETC designation when it did not file line count data and required self-certifications within 60 days of the effective date).

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Because no party has refuted T-Mobile's demonstration that the calculation of the monthly baseline support amount in Rule 54.307(e)(1) is fundamentally at odds with the policy decision on that issue in the Transformation Order, the Commission should grant the T-Mobile PFR.

Sincerely,

/s/Kathleen O'Brien Ham

Kathleen O'Brien Ham

Vice President, Federal Regulatory Affairs

T-Mobile USA, Inc.

cc: Sharon Gillet
Carol Matthey
Patrick Halley
Trent Harkrader
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APPENDIX A



USAC Home | High Cost Program | Search Tools | Detailed Payment Data Search

DETAILED PAYMENT DATA SEARCH

Detailed Report

To download this report, click on the Excel icon below.

SPIN=Service Provider ID Number; SAC=Study Area Code; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; LTS=Long Term Support; SNA=Safety Net Additive; SVS=Safety Valve Support; CAP=IAS and State Cap adjustment type; PD=Phase Down Cap adjustment type

This disbursement tool contains data from September 2011 through the selected year and month

Advanced Search:

SPIN:

Study Area Code:

Study Area Name:

Year: 2011

Month: 11

State: HAWAII


Fund: ALL

Search Clear

Basic Search

State	SPIN	SAC	Study Area Name	Year	Month	Component	Capped Current Period	Uncapped Current Period	Prior Period Adjustments	Current Period Cap	Current Period Phase Down	Prior Period Cap	Prior Period Phase Down	Disbursed Amount
HI	143019623	629001	NPCR, INC.	2011	11	HCL	\$115,449.00	\$122,218.00	\$0.00	(\$6,769.00)	\$0.00	\$1,497.00	\$0.00	\$116,946.00
HI	143031532	629002	CORAL WIRELESS DBA MOBI PCS	2011	11	HCL	\$1,414,633.00	\$1,497,566.00	\$0.00	(\$82,933.00)	\$0.00	(\$18,328.00)	\$0.00	\$1,396,305.00
HI	143026181	629003	T-Mobile West Corporation	2011	11	HCL	\$171,913.00	\$181,992.00	\$0.00	(\$10,079.00)	\$0.00	(\$2,755.00)	\$0.00	\$169,158.00
HI	143019623	629001	NPCR, INC.	2011	11	IAS	\$12,237.00	\$21,229.00	\$0.00	(\$8,992.00)	\$0.00	(\$510.00)	\$0.00	\$11,727.00
HI	143031532	629002	CORAL WIRELESS DBA MOBI PCS	2011	11	IAS	\$5,629.00	\$9,765.00	\$0.00	(\$4,136.00)	\$0.00	(\$255.00)	\$0.00	\$5,374.00
HI	143026181	629003	T-Mobile West Corporation	2011	11	IAS	\$19,586.00	\$33,977.00	\$0.00	(\$14,391.00)	\$0.00	(\$980.00)	\$0.00	\$18,606.00
HI	143019623	629001	NPCR, INC.	2011	11	ICLS	\$60,377.00	\$63,917.00	(\$10,372.00)	(\$3,540.00)	\$0.00	\$504.00	\$0.00	\$50,509.00
HI	143031532	629002	CORAL WIRELESS DBA MOBI PCS	2011	11	ICLS	\$878,775.00	\$930,293.00	(\$53,296.00)	(\$51,518.00)	\$0.00	(\$12,792.00)	\$0.00	\$812,687.00
HI	143026181	629003	T-Mobile West Corporation	2011	11	ICLS	\$102,426.00	\$108,431.00	\$0.00	(\$6,005.00)	\$0.00	(\$1,696.00)	\$0.00	\$100,730.00
HI	143019623	629001	NPCR, INC.	2011	11	LSS	\$9,791.00	\$10,365.00	\$0.00	(\$574.00)	\$0.00	\$106.00	\$0.00	\$9,897.00
HI	143031532	629002		2011	11	LSS	\$119,968.00	\$127,002.00	\$0.00	(\$7,034.00)	\$0.00	(\$1,640.00)	\$0.00	\$118,328.00

				CORAL WIRELESS DBA MOBI PCS											
+	HI	143026181	629003	T-Mobile West Corporation	2011	11	LSS	\$14,579.00	\$15,434.00	\$0.00	(\$855.00)	\$0.00	(\$232.00)	\$0.00	\$14,347.00
+	HI	143019623	629001	NPCR, INC.	2011	11	SNA	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
+	HI	143031532	629002	CORAL WIRELESS DBA MOBI PCS	2011	11	SNA	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
+	HI	143026181	629003	T-Mobile West Corporation	2011	11	SNA	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

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APPENDIX B



USAC Home | High Cost Program | Search Tools | Funding Disbursement Search

FUNDING DISBURSEMENT SEARCH RESULTS

LSS=Local Switching Support; LTS=Long Term Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support.

High Cost Disbursement Data (Spin = ALL, Sac = ALL, San = ALL, Year = 2011, Month = Sep, State = LA)
 This disbursement tool contains data from Jan 2003 through Feb 2012.

State	Spin	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	LTS	SNA	SVS	FHCS	Year	Month
LA	143001583	270423	CENTURYTEL-CENTR LA	\$140,163	\$0	\$0	\$136,787	\$18,845	\$0	\$0	\$0	\$0	2011	Sep
LA	143001584	270424	CENTURYTEL-SE LA	\$69,086	\$0	\$0	\$49,353	\$15,609	\$0	\$20,480	\$0	\$0	2011	Sep
LA	143001585	270425	CAMERON TEL CO - LA	\$386,169	\$0	\$0	\$132,336	\$31,346	\$0	\$0	\$0	\$0	2011	Sep
LA	143001586	270426	CAMPTI-PLEASANT HILL	\$68,655	\$0	\$0	\$44,053	\$8,797	\$0	\$0	\$0	\$0	2011	Sep
LA	143001587	270427	CENTURYTEL-CHATHAM	\$56,787	\$0	\$0	\$25,366	\$3,079	\$0	\$0	\$0	\$0	2011	Sep
LA	143001588	270428	DELCAMBRE TEL CO	\$15	\$0	\$0	\$9,090	\$3,650	\$0	\$0	\$0	\$0	2011	Sep
LA	143001589	270429	EAST ASCENSION TEL	\$1,388,872	\$0	\$0	\$780,779	\$15,028	\$0	\$38,890	\$0	\$0	2011	Sep
LA	143001590	270430	ELIZABETH TEL CO	\$197,890	\$0	\$0	\$66,623	\$6,270	\$0	\$3,543	\$0	\$0	2011	Sep
LA	143001591	270431	CENTURYTEL-NW LA	\$61,602	\$0	\$0	\$67,868	\$19,419	\$0	\$0	\$0	\$0	2011	Sep
LA	143001592	270432	KAPLAN TEL CO	\$87,560	\$0	\$0	\$63,049	\$9,992	\$0	\$0	\$0	\$0	2011	Sep
LA	143001593	270433	LAFOURCHE TEL CO	\$0	\$0	\$0	(\$22,768)	\$35,851	\$0	\$0	\$0	\$0	2011	Sep
LA	143001594	270434	CENTURYTEL-EVANGELIN	\$446,977	\$0	\$0	\$207,556	\$14,912	\$0	\$0	\$0	\$0	2011	Sep
LA	143001595	270435	NORTHEAST LOUISIANA	\$38,848	\$0	\$0	\$46,709	\$8,758	\$0	\$0	\$0	\$0	2011	Sep
LA	143001596	270436	CENTURY NORTH LA	\$87,003	\$0	\$0	\$71,735	\$19,402	\$0	\$0	\$0	\$0	2011	Sep
LA	143001597	270438	RESERVE TEL CO	\$0	\$0	\$0	\$8,091	\$27,840	\$0	\$0	\$0	\$0	2011	Sep
LA	143001598	270439	CENTURYTEL-RINGGOLD	\$4,426	\$0	\$0	\$6,919	\$2,903	\$0	\$0	\$0	\$0	2011	Sep
LA	143001599	270440	CENTURYTEL - EAST LA	\$38,478	\$0	\$0	\$31,688	\$4,327	\$0	\$0	\$0	\$0	2011	Sep
LA	143001600	270441	STAR TEL CO	\$147,599	\$0	\$0	\$62,820	\$6,160	\$0	\$0	\$0	\$0	2011	Sep
LA	143001601	270442	CENTURYTEL-SW LA	\$106,765	\$0	\$0	\$43,436	\$7,891	\$0	\$0	\$0	\$0	2011	Sep
LA	143004824	275183	SO CENTRAL BELL-LA	\$0	\$0	\$771,422	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143029765	279001	CENTENNIAL BEAUREGARD CELLULAR LLC	\$11,277	\$0	(\$280)	(\$23,587)	\$453	\$0	\$12	\$0	\$0	2011	Sep
LA	143029765	279002	CENTENNIAL CALDWELL CELLULAR CORP.	\$1,068	\$0	(\$332)	\$3,559	\$57	\$0	\$0	\$0	\$0	2011	Sep
LA	143029765	279003	CENTENNIAL HAMMOND CELLULAR LLC	\$2,331	\$0	(\$66)	(\$14,481)	\$99	\$0	\$30	\$0	\$0	2011	Sep
LA	143029765	279004	CENTENNIAL MOREHOUSE CELLULAR LLC	\$87	\$0	(\$53)	\$335	\$12	\$0	\$0	\$0	\$0	2011	Sep
LA	143029765	279005	CENTENNIAL LAFAYETTE COMMUNICATIONS LLC	\$0	\$0	(\$27)	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143019623	279006	NPCR, INC.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143017334	279007	LOUISIANA UNWIRED, LLC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143006742	279008	SPRINT SPECTRUM, LP	\$0	\$0	\$27,713	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143008900	279009	ALLTEL COMMUNICATIONS, INC.	\$133,944	\$0	\$57,774	\$105,360	\$34,104	\$0	\$128	\$0	\$0	2011	Sep
LA	143029765	279010	NEW CINGULAR WIRELESS PCS, LLC	\$1,801,351	\$0	\$85,544	\$1,036,731	\$138,836	\$0	\$62,900	\$0	\$0	2011	Sep
LA	143016765	279011	COX LOUISIANA TELCOM LLC	\$0	\$0	\$13,133	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143028554	279012	KAPLAN TELEPHONE CO. DBA PACE COMMUNICATIONS	\$78,704	\$0	\$2,109	\$64,188	\$9,507	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279013	RESERVE LONG DISTANCE COMPANY INC.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143029655	279014	LBH, LLC	\$0	\$0	\$4,287	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279015	VCI COMPANY	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143032385	279016	DPI Teleconnect, LLC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279017	BLC Management, LLC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279018	ABC Telecom	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279019	Image Access, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143030542	279020	Nexus Communications, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143000887	279021	Budget PrePay, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143030542	279022	Nexus Communications, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143032544	279023	Fast Phones, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279024	Freedom Communications USA LLC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279025	TriArch Communications	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279026	TracFone Wireless, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279027	Everycall Communications, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143029765	279028	CENTENNIAL HAMMOND CELLULAR LLC	\$0	\$0	(\$192)	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143029765	279029	CENTENNIAL BEAUREGARD CELLULAR LLC	\$0	\$0	(\$438)	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143029765	279030	CENTENNIAL BEAUREGARD CELLULAR LLC	\$0	\$0	(\$453)	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279031	Image Access, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep

LA	N/A	279032	DPI Teleconnect	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279033	Affordable Phone Services, Inc	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279034	Sprint Prepaid/ Virgin Mobile	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143000677	279035	Cellco Partnership d/b/a Verizon Wireless	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279036	Affordable Phone Services, Inc	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279037	ABC TELECOM	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143000887	279038	Budget PrePay, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279039	Global Connection Inc. of America	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279040	Telrite Corporation dba Life Wireless	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	143035183	279041	Central Louisiana Cellular, LLC	\$157,929	\$0	\$48,923	\$95,305	\$8,991	\$0	\$1,941	\$0	\$0	2011	Sep
LA	N/A	279042	PhoneAid Communications Corp	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279043	Global Connection Inc. Of America	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep
LA	N/A	279044	EveryCall Communications, Inc.	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2011	Sep

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